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Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Re: ***E911 Requirements for IP-Enabled Services, WC Docket No. 05-196  
Subscriber Notification Report***

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice, DA 05-2085, released July 26, 2005, AT&T hereby submits its Subscriber Notification and Acknowledgement Status and Compliance Reports. As the Public Notice indicates, providers of interconnected Voice over Internet Protocol (VoIP) service who meet the specified reporting requirements are eligible for a 30-day extension of the enforcement of the subscriber notification provisions of the Commission's rules governing enhanced 911 (E911) capability. The seven requirements specified in the Notice are set forth below, with AT&T's responses.

- 1. A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e., e-mail, U. S. mail);**

Attachment A, hereto, provides a detailed listing, in chronological order, of the actions AT&T has taken (pp. 3-4) and will continue to take (p. 9) to provide all

AT&T Call Vantage® Service VoIP customers notification of the limited availability of E911 service. As is shown in detail in the Attachment, these actions include affirmative acknowledgements for online orders; two communications by first class U.S. Mail (a letter with a warning sticker and a postcard); three e-mail communications; a reminder message to existing customers making calls to AT&T's service channel; provision of information to non-responders on AT&T's website; automated message on service channel IVR; and delivery of a final automatic voice mail message.

In addition to these actions, which were taken in response to the Commission's June 3, 2005 Order in WC Docket No. 04-36, AT&T has taken steps on its own volition since it first introduced AT&T CallVantage service, to notify all customers of the limitations on E911 service. Most notably, AT&T's Standard Service Subscriber Agreement, which governs the terms of service for all AT&T CallVantage customers, advises customers that they cannot place traditional wireline 911 or E911 service calls; that an alternative 911 or E911 service is provided, with a number of limitations that are fully explained. The AT&T CallVantage website includes a similar, clear and detailed explanation of these limitations. AT&T telephone sales agents also provided information about 911 limitations to ordering customers. Thus, every AT&T CallVantage customer should already be aware of the limited availability of E911 with the service.

With respect to AT&T's Business VoIP customers (who are all in a trial phase), AT&T sent letters on July 6, 2005 advising of the nonavailability of E911 service at this time and providing appropriate warning labels. AT&T received acknowledgements from all remaining trial customers by July 22, 2005.

2. **A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005;**

As of August 9, 2005, 77% of AT&T's subscribers have submitted an affirmative acknowledgement. AT&T estimates that approximately 10% of subscribers will not provide their acknowledgements by August 29, 2005. *See* Attachment A, p. 5. These figures include the 100% affirmative acknowledgement from AT&T's Business VoIP subscribers, as noted above.

3. **A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (*i.e.*, e-mail, U. S. mail);**

As shown in Attachments A, pp. 3-4 and 6, warning stickers were provided to all existing subscribers in a first class letter mailed to the customer's home address on July 22, 2005 and to pending and new subscribers on August 5, 2005. Beginning July 19,

2005, warning stickers have been in telephone adapter boxes for all online and telephone orders. Stickers have also been included in direct fulfillment boxes and AT&T retail warehouse inventory from where equipment is shipped to retail outlets. Effective July 20, 2005, a downloadable warning label became available via the web portal and a link to the label was included near the 911 checkbox for new customers to download during the ordering process.

4. **A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in the first bullet above and/or to whom the provider did not send warning stickers or other appropriate label as identified in the bullet immediately above;**

The percentage of such subscribers is zero.

5. **A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005;**

These actions, described in Attachment A, p. 9, are as follows. First, as of August 11, 2005, AT&T will place a reminder message on its website on the "view bill" page. On August 14, 2005 AT&T's ordering system will not be able to provision orders until mandatory 911 information and acknowledgements are completed. On August 16, 2005, another voice mail will be delivered to all non-responders, reminding them of the obligation to affirmatively acknowledge and warning that their service will be disconnected on August 30, 2005, if they do not do so. On August 23, 2005, AT&T will start placing live calls to all non-responders, again indicating that their service will be disconnected unless an affirmative acknowledgement is received. On August 26, 2005, one final voice mail message will be placed to all non-responders with this same content. On August 30, 2005, AT&T will begin to disconnect service for customers who have not responded. To minimize customer disruption, we would propose disconnection over a three-day period. This would allow orderly reconnection if the customer subsequently acknowledges receipt of the E911 notice and wishes to remain a VoIP subscriber.

6. **A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers;**

Attachment A, p. 10 describes how acknowledgements are maintained.

7. **The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the *VoIP E911 Order*.**

Anthony E. Tuggle  
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Please contact the undersigned if you have any questions regarding this matter.

Very truly yours,  
/s/ Judy Sello

Attachment